

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Action No. 1:15-23-RGA
)	
DAVID R. GIBSON,)	
ROBERT V.A. HARRA,)	
WILLIAM NORTH, and)	
KEVYN RAKOWSKI,)	
)	
Defendants.)	
)	

**DEFENDANT ROBERT V.A. HARRA’S MOTION TO SEAL
SENTENCING MEMORANDUM AND SUPPORTING MATERIALS**

Defendant Robert V.A. Harra (“Defendant”), by and through his undersigned counsel, respectfully moves the Court to seal the Sentencing Memorandum, and supporting materials thereto, submitted on behalf of Robert V.A. Harra (the “Sentencing Memorandum”).

1. On November 20, 2018, Defendant Harra hand-delivered his Sentencing Memorandum to the Court, and requested that the Court file the Sentencing Memorandum under seal.

2. On November 21, 2018, the government filed its Motion to Unseal Defendants’ Sentencing Memoranda and Accompanying Exhibits. (D.I. 854).

3. Counsel for Defendants and the government will meet-and-confer concerning which portions of the Sentencing Memorandum should remain sealed. (*See* D.I. 855).

4. In the interim, Defendant Harra respectfully requests that this Honorable Court enter an Order preliminarily sealing the Sentencing Memorandum *in toto* pending the outcome of Defendants’ meet-and-confer with the government.

Dated: November 27, 2018

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cc: The Honorable Richard G. Andrews
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